

Message

From: Paddack, Mark [mpaddack@eaest.com]
Sent: 3/1/2019 3:50:20 PM
To: Shewmake, Kenneth [shewmake.kenneth@epa.gov]
Subject: Lane Plating Comments

Mr. Shewmake:

I'm in the process of trying to address the last of the comments for the Lane Plating Sampling and Analyses Plan (SAP), and was seeking clarification/your thoughts on the best way to address the below EPA comments:

5. A draft schedule should be included in this plan.

EA will update the schedule based on starting the field work in May. I was thinking that I can place the schedule in Appendix A (Sample Design Matrix) and change the name of the appendix accordingly. That way, if/when Phase 2 occurs, the schedule/sample design matrix for Phase 2 can be added/switched out in this appendix. However, I got to thinking about confidential information, and the sensitive nature of this site, and was wondering if you wanted EA to include the schedule in the SAP (it is generally only provided in EA's Work Plan and Cost Estimate and updated in subsequent revisions), or is this something that EA should provide you separately? The reason I bring this up is that once the City of Dallas and local community see the schedule, they will try to hold EPA to it, and in the world of incremental funding (and shutdowns), there are sometimes delays that cannot be accounted for in a planned schedule.

6. A discussion on background sampling is needed. It is possible LSED-1 and LSED-2 could be considered background sediment values. Additional background sample locations may be needed.

As we have briefly discussed a few times in the past, I was planning on moving the LSED/SW-1, LSED/SW-2, and LSED/SW-3 sample locations to the wetlands area associated with the two ponds east of the site. And then, as necessary address the upstream portion of the unnamed creek during Phase 2. This approach would keep Phase 1 work within scope and address some of the other comments regarding the ponds/wetlands, and the PPEs in these areas.

However, I was still planning on adding a discussion on background sampling, and was thinking about adding it in Section 2.1 (Sampling Process Design) under the section that discusses future phases of the RI investigation. And I will add text that indicates that based on data collected during the Phase 1 RI, background sampling locations for soil, sediment, and surface water will be evaluated and samples will be collected as necessary.

20. Tables A-1 through A-5: The tables associated with sample location figures are not listed in the index.

I was not sure how to address this comment. Did you want EA to add the list of figures and tables under the Appendix A heading, or alternatively, should EA reference the associated Appendix A table on each figure?

As we discussed yesterday, I'm going to try to get copies of the Appendix A figures and tables back to you with the revision that have been made to address comments. I'm still thinking possibly this afternoon, or sometime Monday.

Please let me know if you have questions or comments regarding these matters.

Thank You,
Mark Paddack
EA Project Manager